

REMARKS

Claims 1-23, 25-27, 29-30, 32-36, and 38-40 are in the application. Claims 1, 2, 4, 6-33 and 36-39 are rejected and claims 3, 5, 34, 35 and 40 are objected to by the Examiner. Claims 22, 27, 29, and 30 are currently amended; claims 24, 28, 31, and 37 are canceled; and claims 1-21, 23, 25-26, 32-36, and 38-40 are unchanged from the original versions thereof. Claims 1, 9, 22, 27, 30, 32, and 38 are the independent claims herein.

No new matter has been added to the application as a result of the amendments submitted herein. Reconsideration and further examination are respectfully requested.

Information Disclosure Statement

The Office Action stated that the information disclosure statement (I.D.S.) filed November 2, 2001 fails to comply with 37 CFR 1.98(a)(2), for failing to include a legible copy of each reference cited in the I.D.S. Applicant respectfully states that legible copies of each reference cited in the initial I.D.S. were included with the initial filing of the I.D. S. However, Applicant includes herewith for entry and consideration in the present application a true copy of the I.D.S. originally filed with the Office November 2, 2001, including a copy of each reference originally cited and provided to the Office.

Applicant respectfully requests the Office to enter and consider the references cited in the re-submission of the I.D.S. originally filed November 2, 2001.

Claim Rejections under USC § 103(a)

Claims 1, 2, 4, 6-33, and 36-39 are rejected as being unpatentable over U.S. Patent No. 5,999,936 to Pattison et al. (hereinafter, Pattison) in view of U.S. Patent No. 6,457,006 to Gruenwald. This rejection is traversed

Regarding claim 1, the Office Action states that Pattison substantially discloses Applicant's claim 1. The Office Action admits that Pattison does not disclose that the records

therein comprise a plurality of data fields. The Office Action cites and relies upon Gruenweld for disclosing identifying duplicate data between fields of the records in databases. The Office Action concludes that it would have been obvious to combine the cited and relied upon disclosure of Gruenweld with the disclosure of Pattison “as an essential means to increase integrity of data in a database system and to reduce the time of retrieving data therefrom.”

Applicant notes that claim 1 states, in part:

for each of the first plurality of data fields, determining a first value representing a difference between data specified in the data field and data specified in a respective one of the second plurality of data fields;

for each of the second plurality of data fields, determining a second value representing a difference between data specified in the data field and data specified in a respective one of the first plurality of data fields; and

determining a third value representing a difference between the first record and the second record based on the determined first and second values. (emphasis added)

Thus, it is clear that Applicant claims a method that includes determining a first value representing a difference between data specified in the data field and data specified in a respective one of the second plurality of data fields, determining a second value representing a difference between data specified in the data field and data specified in a respective one of the first plurality of data fields, and determining a third value representing a difference between the first record and the second record based on the determined first and second values.

The rejection cites and relies on the disclosure of Fig. 5. It is noted that, “Fig. 5 of Pattison is a diagram showing the compression process of FIGS. 2(a) and 2(c) as applied to two input records to create two corresponding output compression records, each having record having a format as shown in FIG. 3.” (See Pattison, col. 10, ln. 49-52) Thus, FIG. 5 is an illustration of the compression method depicted in FIGS. 2(a) and 2(c) thereof.

Contrary to Applicant’s claim 1, Pattison discloses a method for compressing a data record wherein the data record is divided into data partitions of equal length, referred to as Small Object Binary (SOBs). (See Pattison, col 5, ln. 66 – col. 6, ln. 3) Pattison compares and assigns

a value to the SOBs in the disclosed compression method(s) thereof. A decision to compress a SOB is made based on the value assigned to each SOB. (See FIG. 2(a), step 208) Pattison discloses compressing the SOB only if the SOB has a category 4 compression bit value. (See FIG. 2(c), steps 246, 248) That is, Pattison does not disclose determining a first value representing a difference between data specified in the data field and data specified in a respective one of the second plurality of data fields value, as claimed by Applicant.

Applicant further notes that the only one value is determined for each SOB. (See FIG. 2(c), steps 238-248) Also, the SOB value of the current record (e.g., record 1 or REC_N) is only compared to a second (previous) record (e.g., record 2 or REC_(N-1)) once, only at step 242.

Applicant further submits that Pattison does not disclose the claimed third value that represents a difference between the first record and the second record based on the determined and claimed first value and second value since Pattison fails to disclose, at least, the first and second values determined as claimed by Applicant.

Moreover, it does not appear that Pattison is concerned with data fields since Pattison divides the records thereof into data blocks of equal length (SOBs) and makes an examination and determination of whether to compress the SOB on the value assigned to the SOB. No examination or determination of data fields is disclosed in Pattison.

Accordingly, it is clear that Pattison discloses determining one value for each SOB (i.e., equal lengths of data), not for a data field of the record. Furthermore, only one value is determined for the SOB, even in the one instance when the first record (e.g., current record, REC_N) is compared to a second record (e.g., previous REC_(N-1)).

Thus, Pattison only discloses determining one value for each SOB that is not the same as Applicant's claimed first value or second value, not a first value and a second value. Pattison also fails to disclose Applicant's claimed third value that represents a difference between the first record and the second record based on the determined first and second values.

Furthermore, since Pattison is not concerned with data fields as discussed above, and purports to disclose a method for compression and decompressing data records that is complete, Applicant respectfully submits that there is no suggestion in the cited and relied upon Pattison and Gruenweld for the combination of Pattison and Gruenweld disclosures as alleged in the Office Action. That is, since Pattison is neither concerned with nor requires knowledge of the data in data fields of a record to fully carry out the methods disclosed therein, combining the alleged disclosure of Gruenweld is not “essential means” to Pattison, as alleged in the Office Action.

In fact, Gruenweld appears to teach away from Pattison with respect to the cited and relied upon disclosure since Pattison does not use or need to know the specific data of data fields.

Therefore, Applicant respectfully submits that the cited and relied upon Pattison and Gruenweld combination fails to render claim 1 obvious for at least the reasons stated above. Accordingly, Applicant requests the reconsideration and withdrawal of the rejection of claim 1 under 35 USC 103(a).

Claims 2, 4, and 6-8 depend from claim 1. Applicant submits that claims 2, 4, and 6-8 are patentable over the cited and relied upon references for at least the reasons stated above regarding claim 1.

Regarding claim 9, Applicant submits that the cited and relied upon Pattison/Gruenweld combination does not disclose the claimed “identifying a plurality of groups of records, wherein data specified in one or more of the plurality of data fields included in a record of a group is identical to data specified in one or more corresponding data fields included in each other record of the group” since (as discussed in detail above regarding claim 1) the compression methods disclosed in Pattison do not require, include, or address the examination of data fields of a record.

Accordingly, Applicant submits that claim 9 is patentable over the cited and relied upon references. Claims 10-21 depend from claim 9. Applicant submits that claims 10-21 are

patentable over the cited and relied upon references for at least the reasons stated above regarding claim 9.

Regarding currently amended claim 22, Applicant submits that claim 22 is patentable over the cited and relied upon Pattison and Gruenweld references for, at least, reasons similar to those stated above regarding claim 1. Claims 23, 25, and 26 depend from claim 22. Applicant submits that claims 23, 25, and 26 are patentable over the cited and relied upon references for at least the reasons stated above regarding claim 22.

Regarding currently amended claim 27, Applicant submits that claim 27 is patentable over the cited and relied upon Pattison and Gruenweld references for, at least, reasons similar to those stated above regarding claim 1. Claim 29 depends from claim 27. Applicant submits that claims 29 is patentable over the cited and relied upon references for at least the reasons stated above regarding claim 27.

Regarding currently amended claim 30, Applicant submits that claim 30 is patentable over the cited and relied upon Pattison and Gruenweld references for at least reasons similar to those stated above regarding claim 1.

Regarding claims 32 and 38, Applicant submits that claims 32 and 38 are patentable over the cited and relied upon Pattison and Gruenweld references for at least reasons similar to those stated above regarding claim 1. Claims 33-36 and 39, depend from claims 32 and 38, respectively. Applicant submits that claims 33-36 and 39 are patentable over the cited and relied upon references for at least the reasons stated above regarding claim 32 and 38.

Claim Rejections under USC § 102(b)

Although paragraph 4 of the Office Action states that claims 1, 2, 4, 6-33, and 36-39 are rejected as being anticipated by Pattison et al. (hereinafter “Pattison”), U.S. Patent No. 5,999,936, all of the arguments in the Office Action appear to support the 35 USC 103(a) rejection of the same claims, as stated in paragraph 3. Accordingly, it appears that the stated

rejection of claims 1, 2, 4, 6-33, and 36-39 under 35 USC 102(b) was included in the Office Action by a clerical error.

In a teleconference with Examiner Thuy N. Pardo on September 13, 2004, it was confirmed that the stated rejection of claims 1, 2, 4, 6-33, and 36-39 under 35 USC 102(b) was included in the Office Action by mistake.

Thus, Applicant respectfully submits that the present Amendment is fully responsive to the pending Office Action.

Allowable Subject Matter

Applicant wishes to acknowledge with appreciation the Office Action's indication of allowable subject matter. In particular, the Office Action stated that claims 3, 5, 34, 35, and 40 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form.

C O N C L U S I O N

Accordingly, Applicants respectfully request allowance of the pending claims, 1-23, 25-27, 29-30, 32-36, and 38-40. If any issues remain, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at (203) 972-0049.

Respectfully submitted,

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Date



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